

In The Matter Of:
Great American Assurance v.
Braddy Preparatory Academy, et al.

Dr. Carroll Harrison Braddy
August 19, 2020

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REGENCY-BRENTANO, INC.
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1 locations did you use them?
2 A. Different, different facilities: 125,
3 Highway 138, Riverdale, 7265 Mt. Zion Road.
4 **Q. Any other properties or locations?**
5 A. Not that I recall.
6 **Q. And I think you said that Keith Hughes did**
7 **not visit the campus prior to --**
8 A. Right.
9 **Q. -- the vandalism occurring; is that right?**
10 A. Correct.
11 **Q. So he only saw it in a post vandalized**
12 **state?**
13 A. Right.
14 **Q. Okay. So did -- post April of 2018, did**
15 **Braddy Prep ever occupy 1706 Washington Road?**
16 A. No.
17 **Q. What's your understanding of when Point**
18 **University left the -- what we're calling the East**
19 **Point campus?**
20 A. I have absolutely no clue when they left.
21 **Q. Is it fair to say that when you were in the**
22 **process of negotiating the lease for the East Point**
23 **campus Point had, had been out for some time?**
24 A. I think, I think it's fair to say that
25 they -- that Point University wasn't -- was no longer

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1 occupying East Point campus when I negotiated the
2 lease.
3 **MR. DOWLING:** Okay. Go off the record for
4 a second.
5 (Whereupon, a discussion was held off the
6 record.)
7 **Q. (By Mr. Dowling) In terms of procuring**
8 **insurance for the East Point campus, my understanding**
9 **is that you delegated that completely to Lorraine**
10 **Brooks; is that right?**
11 A. Yes.
12 **Q. And you never personally had any**
13 **interactions whatsoever with anyone affiliated with**
14 **Powers-Leavitt Insurance Agency during the time that**
15 **you were negotiating the lease and procuring**
16 **insurance?**
17 A. I don't know if I spoke with Gizela Evans
18 via phone or not.
19 **Q. I know you did afterwards with Russ Hart.**
20 A. Yeah. So I don't recall speaking with her
21 during the -- it was all via, you know, e-mailing,
22 you know, back and forth with landlord, et cetera.
23 **Q. And during those -- did you have any**
24 **insurance-related conversations with the landlord**
25 **during the period you were working to try to get the**

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1 policies in place for the East Point campus?
2 A. Not that I, not that I recall.
3 **Q. Hand you what we've previously marked as**
4 **Exhibit 37. If you will just kind of, you know, take**
5 **a quick look through -- well, take as much time as**
6 **you need to review that e-mail correspondence.**
7 A. Okay.
8 **Q. It does not look to me like you were copied**
9 **on any of those messages, but I would like to confirm**
10 **that; you know, if there's a BCC that didn't show up**
11 **on, you know, the printed copies that we got or**
12 **anything like that. I just want to make sure that**
13 **that is correct and that you were not copied in any**
14 **way, shape, or form on any of this e-mail**
15 **correspondence.**
16 A. No. Not that I -- I don't see me being
17 copied on this.
18 **Q. And as you're sitting here right now**
19 **looking at this correspondence, do you recall, you**
20 **know, other than sitting here right now being**
21 **provided a copy of it before today?**
22 A. A copy of this?
23 **Q. Correct.**
24 A. No. I don't recall.
25 **Q. And, you know, Lorraine never forwarded you**

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1 any of the e-mails that are in the body of, you know,
2 the messages that are contained in Exhibit 37?
3 A. From Linda, from Heidi, from Gizela
4 (inaudible).
5 **THE REPORTER:** Keep your voice up or just
6 think to yourself cause I'm having a hard time
7 hearing you.
8 **THE WITNESS:** Oh, I'm sorry. I'm just
9 reading.
10 No. She didn't -- Lorraine didn't forward
11 me anything.
12 **Q. (By Mr. Dowling) Yeah. Just wanted to make**
13 **sure.**
14 **And walk me through, you know, the -- at**
15 **what point during the lease negotiations did the, you**
16 **know, insurance procurement process start? And how**
17 **did you go about communicating to Lorraine what you**
18 **needed given the lease negotiations?**
19 A. Once we received the initial license which
20 was separate from the lease that became a part of the
21 lease --
22 **Q. Right.**
23 A. -- we -- I gave it to Lorraine and she
24 looked. And I told her we need to have -- you know,
25 we need to get insurance. And within the body of the